

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Thomas G. Plummer		
	Debtor	CHAPTER 13
Nationstar Mortgage LLC		
	Movant	
vs.		
Thomas G. Plummer		NO. 14-13103 AMC
	Debtor	
William C. Miller Esq.		
	Trustee	11 U.S.C. Section 362

**MOTION OF Nationstar Mortgage LLC  
FOR RELIEF FROM THE AUTOMATIC STAY  
UNDER SECTION 362**

1. Movant is Nationstar Mortgage LLC.
2. Debtor is the owner of the premises 420 Grape Street, Warminster, PA 18974, hereinafter referred to as the mortgaged premises.
3. Movant is the holder of a mortgage, original principal amount of \$138,300.00 on the mortgaged premises that was executed on January 16, 2004. Said mortgage was recorded on March 19, 2004 at Book 3888, Page 1888. The Mortgage was subsequently assigned to Movant by way of Assignment of Mortgage recorded on July 3, 2013, in Instrument Number 2013056345 in Bucks County.
4. William C. Miller Esq., is the Trustee appointed by the Court.
5. The commencement and/or continuation of the mortgage foreclosure proceedings by reason of non-payment of monthly mortgage payments were stayed by the filing of a Chapter 13 Petition in Bankruptcy by Debtor.
6. Debtor has failed to make the monthly post-petition mortgage payments in the amount of \$1,176.35 for the months of May 2014 through September 2014.
7. In addition to the other amounts due to Movant reflected in this Motion, as of the date hereof, in connection with seeking the relief requested in this Motion, Movant has also incurred \$850.00 in legal fees and \$176.00 in legal costs. Movant reserves all rights to seek an award or allowance of such fees

and expenses in accordance with applicable loan documents and related agreements, the Bankruptcy Code and otherwise applicable law.

8. The total amount necessary to reinstate the loan post-petition is \$5,881.75 (plus attorney's fees & costs).

9. Movant is entitled to relief from stay for cause.

10. This motion and the averments contained therein do not constitute a waiver by Movant of its right to seek reimbursement of any amounts not included in this motion, including fees and costs, due under the terms of the mortgage and applicable law.

WHEREFORE, Movant prays that an Order be entered modifying the Stay and permitting Movant to proceed with its mortgage foreclosure on the mortgaged premises, and to allow the Sheriff's Grantee to take any legal action to enforce its right to possession of the mortgage premises. Further, Movant prays that an Order be entered awarding Movant the costs of this suit, reasonable attorney's fees in accordance with the mortgage document and current law together with interest.

**/s/ Andrew F. Gornall, Esquire**

Andrew F. Gornall, Esquire

Joshua I. Goldman, Esquire

Attorneys for Movant/Applicant

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